

### REMARKS

Reconsideration of this application is respectfully requested in view of the following remarks.

Initially applicant's representative wishes to thank Examiners Philpott and Hsu for the courtesies extended to him during the personal interview conducted April 21, 2005 (the "Examiner's Interview"). The substance of the interview is summarized in the interview summary sheet of that date.

Claims 1-24 and 26-29 are pending and stand rejected. Paragraph 11 of the Office Action rejects claims 1-4, 6-10, 12-24 and 26-29 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,597,688 to Narasimhan *et al* ("Narasimhan"). Paragraph 13 of the Office Action rejects claims 5 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Narasimhan in view of the Examiner's official notice that "a static cost in a system such as that of Narasimhan includes the bandwidth required to transmit a particular file." For the following reasons, as discussed during the Examiner's Interview, Applicant respectfully traverses the rejections.

Each of the independent claims, recites conversion costs in one form or another. For example, claim 1 recites "each conversion engine having an associated cost for performing a conversion...;" claim 7 recites "at least one conversion engine having a cost for converting a file...;" claim 13 recites "a second process to assign a conversion cost to each of the one or more conversion options...;" claim 18 recites "assigning conversion costs to the determined one or more conversion options...;" and claim 23 recites "means for obtaining static and dynamic conversion cost data," "a cost table," and "means for assigning a cost to each conversion option using the costs in the cost table assigned to the conversion engines."

Unlike the conversion costs recited in the claims, Applicant respectfully submits that Narasimhan discloses only costs associated with routing messages. (*See, e.g.*, Narasimhan, 3:15-4:1, 7:3-29, and Table 8.) However, Narasimhan does not disclose, or suggest, conversion costs as recited in the claims of the present application. Indeed, as discussed during the Examiner's Interview, when disclosing file conversion, Narasimhan does not consider conversion costs. (*See, e.g.*, Narasimhan, 13:61-14:12 (discussing conversion of digital fax data to TIFF, and compression of digitized voice data.)) Consequently, applicant respectfully requests that the Examiner reconsider and withdraw the rejection to claims 1-24 and 26-29 as agreed during the Examiner's Interview.

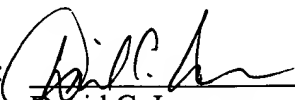
In view of the foregoing all of the pending claims in this case (claims 1-24 and 26-29) are believed to be in condition for allowance. Should the Examiner have any questions or determine that any further action is desirable to place this application in even better condition for issue, the Examiner is encouraged to telephone applicants' undersigned representative at the number listed below.

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Respectfully submitted

CAROLAN ET AL.

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